

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

RONNY L. JACKSON, *et al.*

Plaintiffs,

V.

JOSEPH R. BIDEN, JR *et al.*

Defendants.

No. 2:22-cv-241

**JOINT MOTION TO TEMPORARILY STAY PROCEEDINGS RELATED TO
PLAINTIFFS' CHALLENGE TO ESF ASSISTANCE**

The parties hereby respectfully submit this motion to temporarily stay proceedings related to Plaintiffs' challenge to Economic Support Fund (ESF) assistance provided to the West Bank and Gaza.

1. Plaintiffs in this case filed an Amended Complaint on March 25, 2024, *see* ECF No. 43, which generally challenges two different types of foreign assistance provided by the United States to organizations serving individuals in the West Bank and Gaza. First, the Amended Complaint challenges economic support funding (ESF) to the West Bank and Gaza. *See* Am. Compl. ¶¶ 59-63. Second, the Amended Complaint challenges contributions provided to the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA). *See id.* ¶¶ 31-34.

2. On November 12, 2024, given the change in Administration and the fact that Defendants were not providing contributions to UNRWA, Defendants filed a consent motion to stay proceedings pertaining to Plaintiffs' UNRWA challenge. *See* ECF No. 75. The Court granted this motion on November 13, 2025. *See* ECF No. 78. In accordance with the Court's order staying proceedings related to the UNRWA challenge, the parties will file a joint status report on February 19, 2025. *See id.*

3. Regarding Plaintiffs' ESF claims, Plaintiffs moved for partial summary judgment on September 30, 2024. *See* ECF No. 69. Briefing concluded on November 26, 2024. *See* ECF No. 82. On January 22, 2025, however, the Court ordered further briefing on six different topics. *See* ECF No. 85. Presently, the parties' briefs are due February 22, 2025. *See id.*

4. Since the parties' last filings, the President signed an executive order implementing a 90-day pause in United States foreign assistance for assessment of programmatic efficiencies and consistencies with United States foreign policy. *See* Executive Order, Reevaluating and Realigning United States Foreign Aid, Jan. 20, 2025. Depending on how this review unfolds, there may be no need for this Court to resolve Plaintiffs' challenge regarding the legality of ESF assistance. Thus, a temporary stay of proceedings pertaining to Plaintiffs' ESF challenge is the most efficient course. A stay would conserve the parties' and the Court's resources, and potentially avoid the need for resolution of sensitive legal issues.

5. Within 5 days, Defendants shall notify the Court and all parties if the Defendants lift the pause implemented pursuant to the executive order with respect to ESF assistance for the West Bank and Gaza.

6. Accordingly, Defendants respectfully request a temporary stay of proceedings pertaining to Plaintiffs' ESF challenge, including the Court's request for further briefing, and further propose that the parties confer and file a joint status report regarding the need for further proceedings on this claim, if any, within 7 days of the Defendants notification provided under ¶ 5, *supra*, or if no such notification is made, within 100 days of this motion—*i.e.*, on or before May 16, 2025.

Dated: February 7, 2025

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Undersigned counsel for Defendants, Dorothy Canevari, conferred with counsel for Plaintiffs, Michael Ding, by e-mail regarding this motion. Counsel for Plaintiffs join in this motion.

/s/ Dorothy Canevari
Dorothy Canevari